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VIA ECF AND ELECTRONIC MAIL
(BERNSTEIN.CHAMBERS@NYSB.USCOURTS.GOV)

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *Picard v. Rabin, Adv. Pro. No. 10-04675 (SMB) (Bankr. S.D.N.Y.)*

Dear Judge Bernstein:

On behalf of Irving H. Picard, Esq., Trustee for the substantively consolidated SIPA liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff, we write in response to the October 14, 2015 letter from Sarah P. Kenney requesting that the Court proceed with a previously requested discovery conference to address the defendant's additional request for an extension of the operative expert disclosure deadlines.

While we do not believe that the defendant has articulated any legitimate basis for the significant extension sought, we will consent to an additional—and final—30 day extension (beyond the original 30 day extension we previously offered) simply to avoid unnecessarily burdening this Court. We ask that the defendant serve any expert reports by November 30, 2015, which is the date the defendant most recently requested in its October 14, 2015 letter to the Court.

Given that we are agreeing to the defendant's request for an extension, we do not believe that the discovery conference is necessary.

Respectfully submitted,

/s/ *Nicholas J. Cremona*

Nicholas J. Cremona
Partner

cc: Sarah P. Kenney, Esq.